



October 30, 2002

Docket # 01-BSTD-1

Robert Pernell, Commissioner, Presiding Member
Arthur H. Rosenfeld, Commissioner, Associate Member
2005 Update Residential & Nonresidential Building Standards Proceeding
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Messrs. Pernell and Rosenfeld:

NEMA appreciates the opportunity to comment on the California Energy Commission 2005 Update Residential & Nonresidential Building Standards, Title 24. We note the Workshop Draft document (P400-03-001D) for discussion at the November 5, 2002, meeting and request that our comments be considered at the meeting. The comments in this letter are on lighting controls matters. Our comments are intended to provide design flexibility and eliminate requirements that are not relevant to performance. We reserve the right to provide further comments on this or other relevant topics.

The National Electrical Manufacturers Association (NEMA) is the leading trade association in the United States representing the interests of electroindustry manufacturers. Its 500 member companies manufacture products used in the generation, transmission and distribution, control, and end-use of electricity. Annual shipments of these products total \$100 billion.

Besides the Workshop Draft made available on the CEC website October 22, we have a draft provided by Jon McHugh of the Heschong Mahone Group. The latter draft appears to be one revision beyond the version in the Workshop Draft document. In our comments below, we will make it clear which version we are commenting on.

Workshop Draft—The definition for “MULTI-LEVEL LIGHTING CONTROL” should be revised to add continuous dimming.

In both drafts--The section title should be revised as follows (underlined words to be added)—**119.(e) Automatic Multi-level Daylighting Control Devices in Steps or Continuous Dimming**.

In the McHugh draft—in 119.(e).1.A., first line--

Replace “channels (relays)” with “steps (E.G. relays)”

In both drafts—in 119.(e).2--

Replace “reduced” with “zero”

In both drafts—in 119.(e).3

Replace “time delay circuits” with “a mechanism”

In both drafts—in 119.(e).5

Replace “design” with “required”

In Working Draft—119.(e).9, and in McHugh draft—119.(e).10

The requirement should be “When a light sensor is used to control lights in daylit zones, the light sensor shall be separate from the control device where calibrations are made; and”

In Working Draft and in McHugh draft—SECTION 131.(b)

Insert the words “Stepped or Dimming” at the beginning of the title

In Working Draft and in McHugh draft—SECTION 131.(c)

Insert the words “Stepped or Dimming Controls for” at the beginning of the title

In Working Draft—119.(h).4, and in McHugh draft—131.(c).(2).iv

The words “non-volatile memory” are satisfactory if the intent is to mean this in layman’s terms, rather than a strict computer design sense.

In Working Draft—119.(h).5, and in McHugh draft—131.(c).(2).v

Delete “sunrise and sunset;”

Again, thank you for the opportunity to comment. I look forward to working with you further on the 2005 amendments under development.

Sincerely yours,

A handwritten signature in cursive script that reads "Edward Gray".

Edward Gray
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cc: Bill Pennington, CEC staff
Jon McHugh